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Dear Dr. Taylor:

We are writing to inform you about the large number of products containing aristolochic acid (AA) that are currently for sale on the World Wide Web, despite the earlier FDA warnings in 2000 and 2001 (<http://www.cfsan.fda.gov/~dms/ds-bot.html>), and the voluntary recalls of some products following the FDA warnings. We have been conducting research on the possible cancer hazards of herbal products, and in the course of our work we have identified 112 AA products, which we discuss below. We hope that this information will be useful to the FDA in its efforts to protect the American public from the health effects of AA. Products containing AA present an unreasonable risk of harm to the American consumer. Our results indicating the inadequacy of post-market surveillance and the difficulty of controlling sales on the Internet support the idea that products containing AA should be banned. Herbal medications containing *Aristolochia* species have been banned in Germany, Japan, Malaysia, New Zealand and the UK. In Australia products known to contain AA were canceled, and all manufacturers are required to ensure that herbs which are likely to be used interchangeably with *Aristolochia* are free from AA.

The urgency of the problem of AA is that in Belgium a slimming medication containing AA was found to very rapidly induce nephropathy, kidney failure and urothelial tumors in women, and the response was dose related (Nortier *et al.*, 2000). Subsequently, AA nephropathy has been reported in nine countries (Belgium, China, France, Germany, Japan, Spain, Taiwan, UK, and USA). Urinary tract cancer due to AA has now been found in the UK (Lord *et al.*, 2001; Lord *et al.*, 1999) and Taiwan (Chang *et al.*, 2001; Yang *et al.*, 2000) as well as Belgium (Cosyns *et al.*, 1994; Nortier *et al.*, 2000; Vanherweghem *et al.*, 1995). Our findings of these 112 products are particularly alarming because they occurred after FDA action. Additionally, unlike the Belgian pills, which contained *Aristolochia* by substitution, 19 products on the Web intend to include botanical species that contain AA (*Aristolochia* spp. and *Asarum canadense*) and list them on the bottle (see Table 1).

Whereas Americans today are easily able to purchase products containing AA, which is a known human carcinogen, more than 20 years ago the German Federal Health Office prohibited the sale of 240 products containing AA due to its potent carcinogenic effects in rats (Bundesgesundheitsamt, 1982).

#### **Available Products Containing Aristolochic Acid**

The FDA advised industry in 2001 not to manufacture products that contain AA (<http://www.cfsan.fda.gov/~dms/ds-bot14.html>), and the FDA restricted the importation of products that potentially contain AA ([http://www.fda.gov/ora/fiars/ora\\_import\\_ia5410.html](http://www.fda.gov/ora/fiars/ora_import_ia5410.html)). The

results of our recent work are presented in Tables 1-3. Each table reports the botanical species, the name of the medicinal preparation, the retailer, the manufacturer, and the Web page link for the product containing AA. The vast majority of these products have a US Web address. The results indicate that consumers are not currently protected from taking herbal products known or suspected to contain AA, in spite of earlier FDA action. Moreover, AA has recently been evaluated by the World Health Organization as a human carcinogen (International Agency for Research on Cancer, 2002).

Table 1 reports products with botanical species that are known to contain AA. Nine medicinal preparations contain *Aristolochia* species, and 10 contain *Asarum canadense*. We found 43 different Web pages that are currently selling such products, and we have attached Web pages for each of these 19 products.

Table 2 reports 80 products with botanical species that FDA listed in 2001 as possibly substituted by *Aristolochia* species. Our work has identified many more such products than FDA identified in 2001. They include products with *Akebia* spp. (21), *Asarum* species other than *Asarum canadense* (14), *Clematis* spp. (14), *Cocculus* spp. (3), *Saussurea lappa* (11), *Sinomenium acutum* (1), and *Stephania* spp. (16). These products are widely available, at 108 Web pages. In Japan, where herbal medicines with *Aristolochia* are not permitted, 10 Kampo formulas were recently identified for which the herbal medicine listed *Akebia* or *Sinomenium* as ingredients but which had been substituted by *Aristolochia* species (Seto *et al.*, 2002).

In addition to the species that were of concern to FDA in 2001, we found some products that do not specify a Latin name for the botanical species, but which are likely to be an *Asarum* because the name on the product is “wild ginger.” The 14 such products and 18 Web pages are reported in Table 3.

One of the products that FDA identified in 2001 was “Aller Relief”, which the FDA reported was voluntarily recalled by its manufacturer, BMK International (Neo Concept), on January 19, 2001 ([http://www.fda.gov/oc/po/firmrecalls/BMK1\\_01.html](http://www.fda.gov/oc/po/firmrecalls/BMK1_01.html)). FDA reported that the manufacturer indicated it would reformulate Aller Relief to remove the *Asarum canadense*, which contains AA. We have communicated with BMK International, which has indicated to us that there is no *Asarum canadense* in the current formulation of Aller Relief, and their Web page does not list *Asarum canadense* among the ingredients. One retailer’s Web page, Spanda (enclosed), however, still lists *Asarum canadense* as an ingredient (<http://spanda.com/neoprods/neoa.html>). Based on this information, either Spanda is incorrectly stating the ingredients of Aller Relief or they are selling old stocks of Aller Relief which contain *Asarum canadense*.

### **The Cancer Hazard of Aristolochic Acid**

The carcinogenic hazard of AA has been known for 20 years from the results of animal experiments. Mengs (1982) reported induction of forestomach, kidney and bladder tumors in rats, occurring unusually rapidly (13-26 weeks to the time of the first tumor). AA is one of the most potent carcinogens in our large database of the results of animal cancer tests, the Carcinogenic Potency Database (<http://potency.berkeley.edu> and Gold *et al.*, (1997)). The dose to induce tumors in rats is more potent (lower) than 98% of the carcinogens in our database. Using the rodent carcinogenic potency of AA and the estimated human AA dose in the Belgian diet clinic, AA would be among the most hazardous human exposures we have studied. The dose administered in the Belgian diet clinic was nearly equal to the dose to induce tumors in rats. AA is also a potent carcinogen in mice (Mengs, 1988) and rabbits (Cosyns *et al.*, 2001), is mutagenic (Robisch *et al.*, 1982), and forms DNA adducts in humans (Bieler *et al.*, 1997; Schmeiser *et al.*, 1996). In rabbits AA induces acute nephrotoxicity, the same DNA adducts in the kidney as in humans, and induces urothelial tumors (Cosyns *et al.*, 2001).

There has been a question about whether AA alone was responsible for the diseases in the Belgian clinic because other compounds were administered simultaneously to the patients, and because the rats in the 1982 cancer test did not develop chronic nephrotoxicity. Experimental results in another animal model, the rabbit, indicate that when AA is given as a single compound, all animals developed interstitial fibrosis in the kidney and some developed urinary tract tumors (Cosyns *et al.*, 2001). Additionally, a more recent study in rats indicates that AA induces chronic renal failure with interstitial fibrosis in salt-depleted rats (Debelle *et al.*, 2002). These results to-

gether with the formation of DNA adducts in both humans and experimental animals, support the hypothesis that AA alone was responsible for kidney failure and cancer in the Belgian diet clinic.

### **Conclusion**

We have identified 112 botanical products that may contain AA, which are readily available to consumers on the World Wide Web. This represents an unreasonable risk of harm given the findings that AA causes nephropathy, kidney failure and urinary tract cancer in humans. Products that contain AA should not be available for consumption by Americans.

The case of AA indicates the lack of adequate safety concerns, pre-market testing and scientific scrutiny for herbal medications as defined in the Dietary Supplement Health and Education Act of 1994 (DSHEA). Regulatory scrutiny for herbal products is weaker than that for food additives, cosmetics or over-the-counter drugs. Unlike food additives or cosmetics, however, herbal medications are recommended at high, pharmacologically active doses that can pose great risk of harm. Moreover, since consumers self-medicate, their intake may exceed that of recommended doses. Since it is not known which consumers are using which herbal products, it is particularly difficult to identify health hazards. In the case of AA, a known clinical population was exposed, and the symptoms were rapid and unusual, thus allowing identification of the health effects. More generally for herbal products, it would be extraordinarily difficult to identify carcinogenic effects in consumers because it is not known who is taking what supplement and for how long, because of the long lag time between exposure and tumor induction for most carcinogens, and because the carcinogenic effect may occur infrequently in a population. AA is readily available on the Web even after FDA warned of its health effects. AA is a known human carcinogen that also produces acute effects in the kidney; therefore it may be an imminent hazard to health and should be immediately withdrawn from the marketplace.

We hope that this issue will receive your earliest attention and would appreciate a response.

Sincerely,

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Enclosures: 3 tables; 19 Web pages of products

cc: Dr. Robert Moore  
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Dr. Jeanne Rader  
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**Table 1. Botanical Products,<sup>a</sup> Available as of March 4, 2003 on the Web, that List Ingredients Known to Contain Aristolochic Acid**

Species	Medicinal Name	Retailer	Manufacturer	Web page with AA Product
Aristolochia clematis	PMS-Ease	InnerLife Wellness Center	Växa	<a href="http://www.innerlifewellness.com/products/pms.html">http://www.innerlifewellness.com/products/pms.html</a>
Aristolochia fangji	Tong Xue Pian Tablets	MerchantAmerica.com		<a href="http://www.merchantamerica.com/herbs/index.php?ba=product_enlarge&amp;product_id=11651">http://www.merchantamerica.com/herbs/index.php?ba=product_enlarge&amp;product_id=11651</a>
Aristolochia manshuriensis	Long Dan Xie Gan Wan / Long Dan Xie Gan Pian / Lung Tan Xie Gan	Morningstarhealth.com Vitasprings.com Wing Hop Fung Ginseng 4 Less Angel Herb: Herbs for Health MaxNature TCM Healing Center for Men's Diseases Oriental Chinese Medicine Wholesale Retail Company ChineseHerb.com HierbasChinas.com Chinese Patent Medicines China Guide Herbswest.net		<a href="http://www.morningstarhealth.com/store/product133.html">http://www.morningstarhealth.com/store/product133.html</a> <a href="http://www.vitasprings.com/londanxiegan1.html">http://www.vitasprings.com/londanxiegan1.html</a> <a href="http://www.winghopfung.com/winghopfung/londanxiegan.html">http://www.winghopfung.com/winghopfung/londanxiegan.html</a> <a href="http://www.ginseng4less.com/chinese2.html">http://www.ginseng4less.com/chinese2.html</a> <a href="http://www.talonsvcs.com/angelherb/tcm-clear-heat.htm">http://www.talonsvcs.com/angelherb/tcm-clear-heat.htm</a> <a href="http://www.maxnature.com/londanxiegan.html">http://www.maxnature.com/londanxiegan.html</a> <a href="http://www.mendiseasestcm.com/images/drugstore/product-08-h.htm">http://www.mendiseasestcm.com/images/drugstore/product-08-h.htm</a> <a href="http://www.tcm-treatment.com/images/herb-supply/product-price/product-08-h.htm">http://www.tcm-treatment.com/images/herb-supply/product-price/product-08-h.htm</a> <a href="http://www.chineseherb.com/Merchant2/merchant.mv?Screen=PROD&amp;Store_Code=CWH&amp;Product_Code=CWH42">http://www.chineseherb.com/Merchant2/merchant.mv?Screen=PROD&amp;Store_Code=CWH&amp;Product_Code=CWH42</a> <a href="http://www.hierbaschinas.com/Merchant2/merchant.mv?Screen=PROD&amp;Store_Code=HC&amp;Product_Code=CWH42">http://www.hierbaschinas.com/Merchant2/merchant.mv?Screen=PROD&amp;Store_Code=HC&amp;Product_Code=CWH42</a> <a href="http://www.kangleso.com/more_patent.html">http://www.kangleso.com/more_patent.html</a> <a href="http://www.china-guide.com/hr00ld12.html">http://www.china-guide.com/hr00ld12.html</a> <a href="http://www.herbswest.net/items/BL2080.shtml">http://www.herbswest.net/items/BL2080.shtml</a>
Aristolochia manshuriensis	Q13: Five Types Stranguria Pill (Wu Lin Wan)	TCM Healing Center for Men's Diseases Oriental Wholesale & Retail Company	Guangdong Guoyitang Herbal Manufacturing Co., Ltd.	<a href="http://www.mendiseasestcm.com/images/drugstore/product-17-q.htm">http://www.mendiseasestcm.com/images/drugstore/product-17-q.htm</a> <a href="http://www.tcm-treatment.com/images/herb-supply/product-price/product-17-q.htm">http://www.tcm-treatment.com/images/herb-supply/product-price/product-17-q.htm</a>
Aristolochia sp.	Chi Kuan Yen Wan	Angel Herb: Herbs for Health Opone.com		<a href="http://www.talonsvcs.com/angelherb/tcm-treat-arthritis.htm">http://www.talonsvcs.com/angelherb/tcm-treat-arthritis.htm</a> <a href="http://store.yahoo.com/opane/coughchikuany.html">http://store.yahoo.com/opane/coughchikuany.html</a> <a href="http://www.opane.com/coughchikuany.html">http://www.opane.com/coughchikuany.html</a> Health Canada reports this to contain aristolochic acid: <a href="http://www.hc-sc.gc.ca/english/protection/warnings/2001/2001_100e.htm">http://www.hc-sc.gc.ca/english/protection/warnings/2001/2001_100e.htm</a>
Aristolochia sp.	Guan Xin Su He / Circulatory Cardioflex	Angel Herb: Herbs for Health Opone.com		<a href="http://www.talonsvcs.com/angelherb/tcm-orifices.htm">http://www.talonsvcs.com/angelherb/tcm-orifices.htm</a> <a href="http://www.opane.com/circar30pilk.html">http://www.opane.com/circar30pilk.html</a>
Aristolochia sp.	Gui Pi Wan	Doc4Pain.com		<a href="http://www.doc4pain.com/.sc/ms/cat/1032987946/9/nc/Hematology--Ease%20to%20Bruise">http://www.doc4pain.com/.sc/ms/cat/1032987946/9/nc/Hematology--Ease%20to%20Bruise</a>
Aristolochia sp. (+ Coltsfoot)	Chuan Ke Wan	Herbs West		<a href="http://herbswest.net/items/BL1355.shtml">http://herbswest.net/items/BL1355.shtml</a>
Aristolochia sp. + Clematis sp.	Circula	Opone.com PlazaQ.com		<a href="http://store.yahoo.com/opane/mintopici.html">http://store.yahoo.com/opane/mintopici.html</a> <a href="http://store.yahoo.com/plusq/mintonpilcir.html">http://store.yahoo.com/plusq/mintonpilcir.html</a>

Asaraum canadense	Wild ginger capsules	Taylor's Organic Gardens	Taylor's Organic Gardens	<a href="http://www.taylorgarden.com/Products/Bulk_New.asp?Common_Name=Wild%20Ginger">http://www.taylorgarden.com/Products/Bulk_New.asp?Common_Name=Wild%20Ginger</a>
Asarum (canadense)	Old Indian Herbal Syrup	Herbal Advisor	Planetary Formulas	<a href="http://www.herbaladvisor.com/topten/xq/asp/qx/guidplan3.htm">http://www.herbaladvisor.com/topten/xq/asp/qx/guidplan3.htm</a> <a href="http://www.herbaladvisor.com/shop/xq/asp/pid.1717/ptid.2066/qx/productDetail.htm">http://www.herbaladvisor.com/shop/xq/asp/pid.1717/ptid.2066/qx/productDetail.htm</a>
Asarum canadense	Cold Away	Sunriseherbfarm.com		<a href="http://www.sunriseherbfarm.com/coldaway.html">http://www.sunriseherbfarm.com/coldaway.html</a>
Asarum canadense	Cramp Relief	Sunrise Herbal Remedies	Sunrise Herbal Remedies	<a href="http://www.sunriseherbfarm.com/cramprelief.html">http://www.sunriseherbfarm.com/cramprelief.html</a>
Asarum canadense	Formula 208	Web Vitamins	Heritage Products	<a href="http://www.webvitamins.com/product.aspx?number=HT-FORM208-8Z">http://www.webvitamins.com/product.aspx?number=HT-FORM208-8Z</a>
Asarum canadense	Mother Earth's Cough Syrup / Mother Earth's Respiratory System Tonic	InterNatural Kalyx.com DiscountBlvd.com NutritionBlvd.com	Heritage Products	<a href="http://store.yahoo.com/international/179190.html">http://store.yahoo.com/international/179190.html</a> <a href="http://www.kalyx.com/store/proddetail.cfm/ItemID/6722.0/CatgoryID/6000.0/SubCatID/985.0/file.htm">http://www.kalyx.com/store/proddetail.cfm/ItemID/6722.0/CatgoryID/6000.0/SubCatID/985.0/file.htm</a> <a href="http://store.yahoo.com/discountboulevard/188033.html">http://store.yahoo.com/discountboulevard/188033.html</a> <a href="http://store.yahoo.com/nutritionblvd/188033.html">http://store.yahoo.com/nutritionblvd/188033.html</a>
Asarum canadense	Viral Resolve	Sunriseherbfarm.com		<a href="http://www.sunriseherbfarm.com/viralresolve.html">http://www.sunriseherbfarm.com/viralresolve.html</a>
Asarum canadense	Wild Ginger tincture	Crucible Catalog	Spagyric Tinctures	<a href="http://www.crucible.org/spagyricsS-Z.htm">http://www.crucible.org/spagyricsS-Z.htm</a>
Asarum canadense	Wild Ginger tincture	Spring Valley Herbs and Natural Foods	Teeter Creek	<a href="http://www.springvalleyherbs.com/catalog.php?itemID=2025">http://www.springvalleyherbs.com/catalog.php?itemID=2025</a> <a href="http://www.teetercreekherbs.com/single/wildginger.html">http://www.teetercreekherbs.com/single/wildginger.html</a>
Asarum canadense + Akebia trifoliata	Aller Relief <sup>b</sup>	Spanda	Neo Concept	<a href="http://spanda.com/neoprods/nea.html">http://spanda.com/neoprods/nea.html</a> <a href="http://www.neoconcept.com/aller_d.html">http://www.neoconcept.com/aller_d.html</a>

<sup>a</sup> for Oral Use

<sup>b</sup> Footnote added after March 2002: Website no longer lists as ingredients either Asarum canadense or Akebia trifoliata.

**Table 2. Botanical Products,<sup>a</sup> Available as of March 4, 2003 on the Web, that List Ingredients that May Be Adulterated with Aristolochic Acid**

Species	Medicinal Name	Retailer	Manufacturer	Web page with AA Product
Akebia sp.	Akebia	Botanicum		<a href="http://botanicum.com/neworder.html">http://botanicum.com/neworder.html</a>
Akebia sp.	Alive Energy: Mental and Emotional Strength Women's Courage 60's	InterNatural		<a href="http://store.yahoo.com/international/400415.html">http://store.yahoo.com/international/400415.html</a>
Akebia sp.	Circulation: Specific Rubrella Care	Opone.com		<a href="http://www.opone.com/cirspecurbca.html">http://www.opone.com/cirspecurbca.html</a>
Akebia sp.	Eye Relief Capsules	diabetes-alternative-medicine.com		<a href="http://www.diabetes-alternative-medicine.com/diabetesretinopathy.html">http://www.diabetes-alternative-medicine.com/diabetesretinopathy.html</a>
Akebia sp.	Genpriv	Mandarin Herbs		<a href="http://mandarinherbs.com/genital.htm">http://mandarinherbs.com/genital.htm</a>
Akebia sp.	K-C	The Herb Nook Virtualherbs.com	Nature's Sunshine	<a href="http://www.herbnook.com/nspchr4.htm">http://www.herbnook.com/nspchr4.htm</a> <a href="http://www.virtualherbs.com/store/manf.cfm?categoryID=14">http://www.virtualherbs.com/store/manf.cfm?categoryID=14</a>
Akebia sp.	Lung Tan Xie Gan Wan Combination	Wing Hop Fung		<a href="http://www.winghopfung.com/winghopfung/luntanxiegan.html">http://www.winghopfung.com/winghopfung/luntanxiegan.html</a>
Akebia sp.	Shi Chuan Xiu Xue Tang (General Purpose Stop Blood Formula)	Ancient Way Acupuncture & Herbs		<a href="http://www.ancientway.com/Pages/MartialArtsFormulas.html">http://www.ancientway.com/Pages/MartialArtsFormulas.html</a>
Akebia sp.	Wind-Dispelling Powder (Xiao Feng San)	Nature's Health		<a href="http://www.nature-s-health.com/products/herbaltea/auto/fml00043.htm">http://www.nature-s-health.com/products/herbaltea/auto/fml00043.htm</a>
Akebia sp. + Asarum sp.	Nasixx	MyHerbalRx.com		<a href="http://www.myherbalrx.com/products/nasixx2.htm">http://www.myherbalrx.com/products/nasixx2.htm</a>
Akebia sp. + Asarum sp.	Sinus Clear Ephedra Free	Vitanet	Ridge Crest Herbals	<a href="http://store.yahoo.com/vitanet/sinclearnoep1.html">http://store.yahoo.com/vitanet/sinclearnoep1.html</a>
Akebia sp. + Stephania sp.	Chinese Kidney Activator (formerly K-C)	BlessedNutrition.com Herbshop.com		<a href="http://www.blessednutrition.com/ns1872-5.html">http://www.blessednutrition.com/ns1872-5.html</a> <a href="http://www.mindspring.com/~herbshop/urinary.htm">http://www.mindspring.com/~herbshop/urinary.htm</a>
Akebia sp. + Stephania sp.	Chinese Kidney Activator (K-C) [Eliminate Moisture] Qu Shi	Mind, Body & Soul Healer The Reynolds Office of Health and Nutrition Go With Herbs Plain Herb		<a href="http://www.soulhealer.com/1872-5.htm">http://www.soulhealer.com/1872-5.htm</a> <a href="http://www.reynoldsoffice.com/1872-5.htm">http://www.reynoldsoffice.com/1872-5.htm</a> <a href="http://www.gowithherbs.com/1872-5.htm">http://www.gowithherbs.com/1872-5.htm</a> <a href="http://www.plainherb.com/1872-5.htm">http://www.plainherb.com/1872-5.htm</a>
Akebia sp. + Stephania sp.	K-C (Eliminate Moisture/Qu Shi) - Kidney Support	Superlative Soundness		<a href="http://www.junycorp.com/soundness/k-c.html">http://www.junycorp.com/soundness/k-c.html</a>
Akebia trifoliata	Bai Ji Li (5:1 herb extract powder)	Kalyx.com	Plum Flower	<a href="http://www.kalyx.com/store/proddetail.cfm/ItemID/15355.0/CategoryID/13000.0/SubCatID/2855.0/file.htm">http://www.kalyx.com/store/proddetail.cfm/ItemID/15355.0/CategoryID/13000.0/SubCatID/2855.0/file.htm</a>
Akebia trifoliata	Eight Righteous / Ba Zheng San Wan	Herbswest.net Jade Chinese Herbs & Extracts		<a href="http://www.herbswest.net/items/13325.shtml">http://www.herbswest.net/items/13325.shtml</a> <a href="http://www.kangleso.com/jade.html">http://www.kangleso.com/jade.html</a>
Akebia trifoliata	Hepataplex	2000 + Nutrition Center		<a href="http://www.randallnutritioncenter.com/rcnc2000/tcb9.html">http://www.randallnutritioncenter.com/rcnc2000/tcb9.html</a>
Akebia trifoliata	Kai Kit Wan (Reduce Prostate Swelling Pills)	Herbswest.net		<a href="http://www.herbswest.net/items/13956.shtml">http://www.herbswest.net/items/13956.shtml</a>
Akebia trifoliata	Prostate: Kai Kit Pills	Opone.com	Hanyang pharmaceutical	<a href="http://www.opone.com/proskaikitpi.html">http://www.opone.com/proskaikitpi.html</a>

Akebia trifoliata	Prostate: Kai Kit Wan	Healing Herbs of China	Plum Flower	<a href="http://store.yahoo.com/healingherbschina/prosenkaikit.html">http://store.yahoo.com/healingherbschina/prosenkaikit.html</a>
Akebia trifoliata	Prostate: Prostate Gland Care	Opane.com		<a href="http://www.opane.com/prosprosglan.html">http://www.opane.com/prosprosglan.html</a>
Asarum heterotropoides	Bai Ji Li (5:1 herb extract powder)	Kalyx.com	Plum Flower	<a href="http://www.kalyx.com/store/proddetail.cfm/ItemID/15448.0/CategoryID/13000.0/SubCatID/2855.0/file.htm">http://www.kalyx.com/store/proddetail.cfm/ItemID/15448.0/CategoryID/13000.0/SubCatID/2855.0/file.htm</a>
Asarum heterotropoides	Bio-Antihist	Natural Health Consultants	Ameriden	<a href="http://www.naturalhealthconsult.com/Monographs/BioAntihist.html">http://www.naturalhealthconsult.com/Monographs/BioAntihist.html</a>
Asarum sp.	100% Herbal Treatment for Tinnitus	Young Again Nutrients		<a href="http://store.yahoo.com/marcella75/tinnitus.html">http://store.yahoo.com/marcella75/tinnitus.html</a>
Asarum sp.	Asarum	Botanicum		<a href="http://botanicum.com/neworder.html">http://botanicum.com/neworder.html</a>
Asarum sp.	AsthmaClear	LifeHealthEnergy.com		<a href="http://www.lifehealthenergy.com/htdocs/TheMall/Remedies/asthmauclear.htm">http://www.lifehealthenergy.com/htdocs/TheMall/Remedies/asthmauclear.htm</a>
Asarum sp.	Azarina	Qlife Batory Asset Managment		<a href="http://www.qlife.com/azarina.html">http://www.qlife.com/azarina.html</a> <a href="http://www.merchantamerica.com/qlife/index.php?ba=product_enlarge&amp;category=1843&amp;product_id=6747">http://www.merchantamerica.com/qlife/index.php?ba=product_enlarge&amp;category=1843&amp;product_id=6747</a>
Asarum sp.	Beijing Tong Ren TangQi Guan Yan Ke Sou Tan Chuan Wan	Opane.com	Tong Ren Tang	<a href="http://www.opane.com/beijtonrenta24.html">http://www.opane.com/beijtonrenta24.html</a> <a href="http://store.yahoo.com/plusq/beijtonrenta24.html">http://store.yahoo.com/plusq/beijtonrenta24.html</a>
Asarum sp.	Breath Easy	NutraCompute		<a href="http://www.nutracompute.com/Detail/Breathe_Easy/Item91.htm">http://www.nutracompute.com/Detail/Breathe_Easy/Item91.htm</a>
Asarum sp.	Chuan Qiong Cha Tiao Pian	VitaSprings.com		<a href="http://store.yahoo.com/vitasprings/chuanqioncha.html">http://store.yahoo.com/vitasprings/chuanqioncha.html</a> <a href="http://www.vitasprings.com/chuanqioncha.html">http://www.vitasprings.com/chuanqioncha.html</a>
Asarum sp.	Clear Tinnitus	AlzheimerSupport.com ProHealthNetwork.com ChronicFatigueSyndromeSupport.com LifesVigor.com and many others	Clear Products	<a href="https://www.alzheimersupport.com/shop/product.cfm?product__code=N0161">https://www.alzheimersupport.com/shop/product.cfm?product__code=N0161</a> <a href="https://www.prohealthnetwork.com/TreatmentCenter/product.cfm?product__code=N0161">https://www.prohealthnetwork.com/TreatmentCenter/product.cfm?product__code=N0161</a> <a href="http://www.chronicfatiguesyndromesupport.com/shop/product.cfm?product__code=N0161">http://www.chronicfatiguesyndromesupport.com/shop/product.cfm?product__code=N0161</a> <a href="http://www.lifesvigor.com/products/575102.html">http://www.lifesvigor.com/products/575102.html</a> and many others
Asarum sp.	M05: Brain-Conquering Calmness Capsule (Zhen Nao Ning Jiao Nang)	TCM Healing Center for Men's Diseases Oriental Wholesale & Retail Company		<a href="http://www.mendiseasestcm.com/images/drugstore/product-13-m.htm">http://www.mendiseasestcm.com/images/drugstore/product-13-m.htm</a> <a href="http://www.tcm-treatment.com/images/herb-supply/product-price/product-13-m.htm">http://www.tcm-treatment.com/images/herb-supply/product-price/product-13-m.htm</a>
Asarum sp.	Migrex	MyHerbalRx.com		<a href="http://www.myherbalrx.com/products/migrex.htm">http://www.myherbalrx.com/products/migrex.htm</a>
Asarum sp.	Notoptergium Decoction with Nine Herbs (Jiu Wei Qiang Huo Tang)	Nature's Health		<a href="http://www.nature-health.com/products/herbaltea/auto/fml00018.htm">http://www.nature-health.com/products/herbaltea/auto/fml00018.htm</a>
Asarum sp.	Xiao Qing Long Wan (Concentrated Chinese Herb for Common Cold)	MaxNature.com		<a href="http://www.maxnature.com/xiqinlonwanc.html">http://www.maxnature.com/xiqinlonwanc.html</a>
Clematis chinensis	Diabetics Yu Xiao San 8804	VitaSprings.com Chong's Health Care		<a href="http://store.yahoo.com/vitasprings/yuxiaosan8804.html">http://store.yahoo.com/vitasprings/yuxiaosan8804.html</a> <a href="http://store.yahoo.com/cljhealth/yuxiaosan88052.html">http://store.yahoo.com/cljhealth/yuxiaosan88052.html</a>
Clematis chinensis	Flex N Spring	Health Products Distributors		<a href="http://www.integratedhealth.com/hpdspec/cherb.html">http://www.integratedhealth.com/hpdspec/cherb.html</a>
Clematis chinensis	Joint Health	N101	Rainbow Light	<a href="http://www.n101.com/Static/Products/joint_health_1072301347.html">http://www.n101.com/Static/Products/joint_health_1072301347.html</a>
Clematis chinensis	Kam Wo Herbal Tea	PlazaQ.com	Sing-lin	<a href="http://store.yahoo.com/plusq/kamwoherateak.html">http://store.yahoo.com/plusq/kamwoherateak.html</a>
Clematis chinensis	Tien Hsien Natural Nutritious Liquid	Cancerth.com		<a href="http://www.cancerth.com/.sc/ms/cat/1032987946/9/nc/Products--Tien%20Hsien%20Natural%20Nutritious">http://www.cancerth.com/.sc/ms/cat/1032987946/9/nc/Products--Tien%20Hsien%20Natural%20Nutritious</a>

Clematis chinensis	Yu Xiao San 8805	MaxNature.com		<a href="http://www.maxnature.com/yuxbasontrad.html">http://www.maxnature.com/yuxbasontrad.html</a>
Clematis sp.	40+ Nutritional System Joint Health 90's	InterNatural	Rainbow Light	<a href="http://store.yahoo.com/international/845092.html">http://store.yahoo.com/international/845092.html</a>
Clematis sp.	Clematis extract	Stakich, Inc.	Stakich, Inc.	<a href="http://www.stakich.com/Clematis.htm">http://www.stakich.com/Clematis.htm</a>
Clematis sp.	Eucommia Extract	Opone.com		<a href="http://store.yahoo.com/opane/eucex20cap.html">http://store.yahoo.com/opane/eucex20cap.html</a>
Clematis sp.	Eucommiae Musculoskeletal [sic] Support	PlazaQ.com		<a href="http://store.yahoo.com/plusq/eucmussup100.html">http://store.yahoo.com/plusq/eucmussup100.html</a>
Clematis sp.	Head Rescue Extract	Sedonalive.com	NOW	<a href="http://www.sedonalive.com/nowforms.html">http://www.sedonalive.com/nowforms.html</a>
Clematis sp.	Joint Health	NutritionBlvd.com DiscountBlvd.com		<a href="http://store.yahoo.com/nutritionblvd/150219.html">http://store.yahoo.com/nutritionblvd/150219.html</a> <a href="http://store.yahoo.com/discountboulevard/150219.html">http://store.yahoo.com/discountboulevard/150219.html</a>
Clematis sp.	Neck and Shoulders Support	iHerb.com	Planetary Formulas	<a href="http://store.yahoo.com/iherb/upbacsupplan.html">http://store.yahoo.com/iherb/upbacsupplan.html</a>
Clematis sp. + Stephania sp.	Clematis & Stephania	TCMM Formulas		<a href="http://www.tcmformulas.com/studentliquidself.htm">http://www.tcmformulas.com/studentliquidself.htm</a>
Cocculus cordifolia	Guduchi	HerbalRemedies.com	Vadik Herbs	<a href="http://store.yahoo.com/herbal-remedies-usa/guduchi50caps.html">http://store.yahoo.com/herbal-remedies-usa/guduchi50caps.html</a>
Cocculus indicus	Neuran	InnerLife Wellness Center	Växa	<a href="http://www.innerlifewellness.com/products/neuran.html">http://www.innerlifewellness.com/products/neuran.html</a>
Cocculus indicus	PMS	Spring Valley Herbs	Hyland	<a href="http://www.springvalleyherbs.com/catalog.php?itemID=923">http://www.springvalleyherbs.com/catalog.php?itemID=923</a>
Saussurea lappa	BotaniGest	Vitatest	Metagenics	<a href="http://www.vitatest.com/ProductDetail.asp?ProductCode=BOTA&amp;Store=METAGENICS">http://www.vitatest.com/ProductDetail.asp?ProductCode=BOTA &amp;Store=METAGENICS</a>
Saussurea lappa	Cardio Flow	Emerson Ecologics	PL	<a href="http://www.emersonecologics.com/ProductInformation.asp?BrowseBy=CAR18">http://www.emersonecologics.com/ProductInformation.asp?BrowseBy=CAR18</a>
Saussurea lappa	Chinese Mood Elevator (AD-C)	1Dietstore.com	Nature's Sunshine	<a href="http://www.onedietstore.com/chinese_mood-elv.htm">http://www.onedietstore.com/chinese_mood-elv.htm</a>
Saussurea lappa	Chinese Spleen Activator (Wen Zhong) (K3-C)	country-spice.com	Nature's Sunshine	<a href="http://www.country-spice.com/webpages/naturesunshine/nachinesespleen.htm">http://www.country-spice.com/webpages/naturesunshine/nachinesespleen.htm</a>
Saussurea lappa	Chinese Stress Relief (STR-C)	Goherbal.com Greatestherbsonearth.com HerbNook.com	Nature's Sunshine	<a href="http://store.yahoo.com/goherbal/1863-5.html">http://store.yahoo.com/goherbal/1863-5.html</a> <a href="http://www.greatestherbsonearth.com/nsp/chinese_stress_relief.htm">http://www.greatestherbsonearth.com/nsp/chinese_stress_relief.htm</a> <a href="http://www.herbnook.com/nspchr5.htm">http://www.herbnook.com/nspchr5.htm</a>
Saussurea lappa	Complete Antioxidant Support	Betterlife.com N101	Rainbow Light	<a href="http://www.betterlife.com/prod_home_page.asp?prod_id=5194">http://www.betterlife.com/prod_home_page.asp?prod_id=5194</a> <a href="http://www.n101.com/Static/Products/advanced_nutritional_system_1028601377.html">http://www.n101.com/Static/Products/advanced_nutritional_system_1028601377.html</a>
Saussurea lappa	Gastrogen (formerly TCB 6)	eGeneralmedical.com	Metabotanica Method	<a href="http://store.yahoo.com/egeneralmedical/gasherforfor.html">http://store.yahoo.com/egeneralmedical/gasherforfor.html</a>
Saussurea lappa	Liver/Gallbladder Support	Health Designs International	Botanigest	<a href="http://www.healthdesigns.com/ShopSite/Botanige.html">http://www.healthdesigns.com/ShopSite/Botanige.html</a>
Saussurea lappa	UC-C [Enhance Earth] Wen Zhong	HerbNook.com	Nature's Sunshine	<a href="http://www.herbnook.com/nspchr5.htm">http://www.herbnook.com/nspchr5.htm</a>
Saussurea lappa	Ultra Energy Plus	NutritionBlvd.com DiscountBlvd.com	Rainbow Light	<a href="http://store.yahoo.com/nutritionblvd/150026.html">http://store.yahoo.com/nutritionblvd/150026.html</a> <a href="http://store.yahoo.com/discountboulevard/150026.html">http://store.yahoo.com/discountboulevard/150026.html</a>

Saussurea lappa	Ultra Energy Plus	Internatural.com Enk Natural Thymely Solutions Life's Vigor Herbal Advisor and many others	Rainbow Light	<a href="http://store.yahoo.com/international/845210.html">http://store.yahoo.com/international/845210.html</a> <a href="http://store.yahoo.com/enkuerosnet/21888100620.html">http://store.yahoo.com/enkuerosnet/21888100620.html</a> <a href="http://www.absolutelythepurest.com/realestatesurvivalkit/ultraenergy.html">http://www.absolutelythepurest.com/realestatesurvivalkit/ultraenergy.html</a> <a href="http://www.lifesvigor.com/products/150026.html">http://www.lifesvigor.com/products/150026.html</a> <a href="http://www.herbaladvisor.com/shop/xq/asp/pid.17724/ptid.18880/qx/productDetail.htm">http://www.herbaladvisor.com/shop/xq/asp/pid.17724/ptid.18880/qx/productDetail.htm</a> and many others
Sinomenium acutum	Vine Essence Pills	Solstice Medicine Company	Vine Essence	<a href="http://www.sosusaco.com/product/productDetail.asp?iProductID=227">http://www.sosusaco.com/product/productDetail.asp?iProductID=227</a>
Stephania sp.	Water Balance Tonic	Elixir	Elixir	<a href="http://www.elixir.net/Product_Pages/128_WaterBalance.html">http://www.elixir.net/Product_Pages/128_WaterBalance.html</a>
Stephania clematis	OrthoFlex Plus	Betterlife.com	Pacific Biologics	<a href="http://www.betterlife.com/prod_home_page.asp?prod_id=7984">http://www.betterlife.com/prod_home_page.asp?prod_id=7984</a>
Stephania delavaya + Stephania sinica	Spes	Life Extension Vitamins	Botaniclab	<a href="http://store.yahoo.com/lifeextensionvitamins/spes.html">http://store.yahoo.com/lifeextensionvitamins/spes.html</a>
Stephania pierrei	Boh Ra Phet Pung Chang Capsule (Saboo Luerd)	Phuketherb.com		<a href="http://www.phuketherb.com/pd1021742909.htm">http://www.phuketherb.com/pd1021742909.htm</a>
Stephania sp.	Altera Tonic Herbal Supplement: Muscle and Joint Formula	Enk Natural Totaldiscountvitamins.com	Nature's Answer	<a href="http://store.yahoo.com/enkuerosnet/83000011047.html">http://store.yahoo.com/enkuerosnet/83000011047.html</a> <a href="http://www.totaldiscountvitamins.com/Templates/frmTemplateM.asp?CatalogID=2949&amp;SubfolderID=31">http://www.totaldiscountvitamins.com/Templates/frmTemplateM.asp?CatalogID=2949&amp;SubfolderID=31</a>
Stephania sp.	Basic Formulas Dragon Diet	InterNatural	Dragon Eggs Formulas	<a href="http://store.yahoo.com/international/575190.html">http://store.yahoo.com/international/575190.html</a>
Stephania sp.	Ignite Your Life	NutritionStreet.com Healthynutritionaldiet.com		<a href="http://www.nutritionstreet.com/360facts.php">http://www.nutritionstreet.com/360facts.php</a> <a href="http://www.healthynutritionaldiet.com/integriss/360facts.php">http://www.healthynutritionaldiet.com/integriss/360facts.php</a>
Stephania sp.	Ohco-Motion	NutritionBlvd.com DiscountBlvd.com	OHCO/Orient Herb Company	<a href="http://store.yahoo.com/nutritionblvd/496103.html">http://store.yahoo.com/nutritionblvd/496103.html</a> <a href="http://store.yahoo.com/discountboulevard/496110.html">http://store.yahoo.com/discountboulevard/496110.html</a>
Stephania sp.	Over-Eater's Diet	HerbsMD	Alive Energy	<a href="http://www.herbsmd.com/shop/xq/asp/pid.7716/qx/productdetail.htm">http://www.herbsmd.com/shop/xq/asp/pid.7716/qx/productdetail.htm</a>
Stephania sp.	Physical Transformation Formulas Over Eater's	InterNatural	Alive Energy	<a href="http://store.yahoo.com/international/400135.html">http://store.yahoo.com/international/400135.html</a>
Stephania sp.	Stephania & Astragalus Tea Pills	Morningstarhealth.com	Plum Flower	<a href="http://www.morningstarhealth.com/store/product172.html">http://www.morningstarhealth.com/store/product172.html</a>
Stephania sp.	Stephania Astragalus	Kang Le So		<a href="http://www.kangleso.com/herbal_patent.html">http://www.kangleso.com/herbal_patent.html</a>
Stephania sp.	Triphala Herbal Diet Program	Herbal Advisor		<a href="http://www.herbaladvisor.com/topten/guidplan.asp">http://www.herbaladvisor.com/topten/guidplan.asp</a>
Stephania sp. + Clematis sp.	Clematis & Stephania Formula	Spanda	Golden Flower Chinese Herbs	<a href="http://spanda.com/herbs/golden/csf.html">http://spanda.com/herbs/golden/csf.html</a>
Stephania tetandra	Stephania and Astragalus / Fang Ji Huang Qi Wan	Herbswest.net		<a href="http://www.herbswest.net/items/13341.shtml">http://www.herbswest.net/items/13341.shtml</a>
Stephania tetandra	Weight Loss	Vitamin Proshop	Samra	<a href="http://store.yahoo.com/eas4less/samweiglosfo.html">http://store.yahoo.com/eas4less/samweiglosfo.html</a>

<sup>a</sup> for Oral Use

**Table 3. Botanical Products,<sup>a</sup> Available as of March 4, 2003 on the Web, that Have No Latin Name But Are Likely To Be *Asarum* spp.**

Species	Medicinal Name	Retailer	Manufacturer	Web page with AA Product
Chinese wild ginger	Bio-Nutritional Formulas Intestinalis	Needs.com		<a href="http://www.needs.com/store/product_note.asp?prod_id=812">http://www.needs.com/store/product_note.asp?prod_id=812</a>
Chinese wild ginger	Medicated Oil	Solstice Medicine Company	Bee Brand	<a href="http://www.sosusaco.com/product/productDetail.asp?iProductID=150">http://www.sosusaco.com/product/productDetail.asp?iProductID=150</a>
Chinese wild ginger	Mullein Lung Complex with Ephedra	iHerb.com SeacoastVitamins.com	Planetary Formulas	<a href="http://store.yahoo.com/iherb/mullein.html">http://store.yahoo.com/iherb/mullein.html</a> <a href="http://www.seacoastvitamins.com/Planetary/mullein.html">http://www.seacoastvitamins.com/Planetary/mullein.html</a>
Wild ginger	Chinese Specific Cold Pills	Fortune City		<a href="http://members.fortunecity.com/davidpillling/html/body_chcoldpills.htm">http://members.fortunecity.com/davidpillling/html/body_chcoldpills.htm</a>
Wild ginger	Energy Formula	God's Remedy Natural Products		<a href="http://godsremedy.com/hepatitis/energy.htm">http://godsremedy.com/hepatitis/energy.htm</a>
Wild ginger	Expellin Extract	PlazaQ.com Opone.com	Lanzhou Traditional Herbs	<a href="http://store.yahoo.com/plusq/headexk1.html">http://store.yahoo.com/plusq/headexk1.html</a> <a href="http://www.opone.com/headexk1.html">http://www.opone.com/headexk1.html</a>
Wild ginger	First Aid Survival Kit	InterNatural	Turtle Island Herbs	<a href="http://store.yahoo.com/international/299390.html">http://store.yahoo.com/international/299390.html</a>
Wild Ginger	Mother Earth's Cough Syrup	Tao Herb Farm Vitanet	Heritage Products	<a href="http://www.taoherbfarm.com/herbs/herbs/horehound.htm">http://www.taoherbfarm.com/herbs/herbs/horehound.htm</a> <a href="http://store.yahoo.com/vitanet/motear4ozher.html">http://store.yahoo.com/vitanet/motear4ozher.html</a>
Wild Ginger	Tummy Soother	NutritionBlvd.com DiscountBlvd.com Kalyx.com	Nature's Gate	<a href="http://store.yahoo.com/nutritionblvd/225107.html">http://store.yahoo.com/nutritionblvd/225107.html</a> <a href="http://store.yahoo.com/discountboulevard/225107.html">http://store.yahoo.com/discountboulevard/225107.html</a> <a href="http://www.kalyx.com/store/proddetail.cfm/ItemID/9207.0/CategoryID/8000.0/SubCatID/2240.0/file.htm">http://www.kalyx.com/store/proddetail.cfm/ItemID/9207.0/CategoryID/8000.0/SubCatID/2240.0/file.htm</a>
Wild ginger	URI-pH formula	PlazaQ.com		<a href="http://store.yahoo.com/opone/urfork2.html">http://store.yahoo.com/opone/urfork2.html</a>
Wild ginger	Wild ginger tincture	Healingalt.com		<a href="http://www.healingalt.com/Products/herbal_tinctures.htm">http://www.healingalt.com/Products/herbal_tinctures.htm</a>
Wild Ginger / Xi Xin	Du Huo & Loranthus Formula E.C.	Spanda.com	Golden Flower Chinese Herbs	<a href="http://spanda.com/herbs/golden/dhl.html">http://spanda.com/herbs/golden/dhl.html</a>
Xi Xin	Allergy Tamer Elixir	Traditions of Tao		<a href="http://www.traditionsoftao.com/tot/main/products/elixirs.htm">http://www.traditionsoftao.com/tot/main/products/elixirs.htm</a>

<sup>a</sup> for Oral Use